

These are comments about the Draft Interim Guidance document dated Jan 10, 2001. This document correctly is addressed to large institutions. However, it should always be remembered that small institutions will be covered by the *same rules*. This is especially difficult for Small Businesses such as mine, which have only one P.I. [myself] and perhaps 4 employees.

Even though there are no profits and monies being made, the equity requirements make it appear that we have conflicts-of-interest, though they are less than those of PI's at big institutions.

Where the rules appropriate for large insitutions become difficult for the small institution are in:

1. written guidelines/policies
2. educational programs

I do not think that small institutions should be exempted, BUT YOU COULD HELP US A LOT BY OFFERING "SAMPLE" POLICIES THAT FULLY CONFORM TO YOUR RULES. Then we can read them, and incorporate them into our policies more easily than generating these de novo. For example, the STTR program offered sample agreements for use between small businesses and universities that were very helpful. I realize that there are political and other reasons why this may be difficult. IF YOU CAN'T PROVIDE SUCH DOCUMENTS, THEN COULD YOU MAKE A LIST OF UNIVERSITY [OR OTHER] WEBSITES WHICH HAVE SUCH DOCUMENTS? Your guideline suggests making these documents available on the institution's website. If you have a list of "acceptable" versions, then that would be a great time/money saver for us small outfits. Otherwise, we will have no problem complying with the guidelines.

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